From: "Zach Welcker" <ZWelcker@kalispeltribe.com>
To: "Bray, Dave" <Bray.Dave@epa.gov>
Date: 1/17/2018 12:31:43 PM
Subject: RE: response regarding use of prognostic data

Hi Dave,

Any news on the Tribe's Class I Redesignation submittal?

Thanks,
Zach

From: Bray, Dave [mailto:Bray.Dave@epa.gov]
Sent: Tuesday, December 19, 2017 12:47 PM
To: Zach Welcker; McAlpine, Jerrold
Cc: Ken Merrill; Deane Osterman
Subject: RE: response regarding use of prognostic data

Hi Zach,

We definitely understand the Tribe's concern here and are in full agreement that we need a modeling analysis that accurately predicts the near field impacts of the project.

But I don't think that we have a position yet on whether that can be done for this project with prognostic met data in lieu of site-specific met data because we don't yet have either a WRF performance evaluation which demonstrates that the prognostic data is representative, nor any information that collecting site specific data here would not be cost prohibitive, given the approximately 2 years it would take to site a station and collect a year of PSD quality met data.

Jay will continue to work with you and Ecology as the development of the modeling protocol and modeling analyses proceed and we'll continue our internal discussions on this question to firm up our understanding of what the Modeling Guideline recommends for met data.

Dave

David C. Bray
Associate Director for Air
Office of Air and Waste
EPA Region 10
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(206) 553-4253

From: Zach Welcker [mailto:ZWelcker@kalispeltribe.com]
Sent: Tuesday, December 19, 2017 10:53 AM
To: McAlpine, Jerrold <McAlpine.Jay@epa.gov>
Cc: Ken Merrill <kmerrill@kalispeltribe.com>; Deane Osterman <dosterman@kalispeltribe.com>; Bray, Dave <Bray.Dave@epa.gov>
Subject: Re: response regarding use of prognostic data

Thanks for the quick response, Jay.

The plain language of App'x W does not support OAQPS's interpretation. 8.4.1(c) says nothing about equal footing; it merely acknowledges that prognostic data may be used. 8.4.5.1 specifies when prognostic data may be used, i.e. when it is cost prohibitive or infeasible to collect site-specific data.

These limitations reinforce EPA's preference for site-specific data.

In any event, there's no mandate to use prognostic data. EPA does, however, have a trust obligation to the Tribe, and that obligation is compelling here because the Reservation is only 10 miles from the proposed facility and some tribal members live much closer to the facility. Met conditions in Newport are so unique that we feel it is necessary to collect site-specific data to accurately predict the smelter's near field impacts. We expect EPA, as our trustee, to support this request.

Appreciate the help,
Zach

Sent by phone

On Dec 18, 2017, at 2:55 PM, McAlpine, Jerrold <McAlpine.Jay@epa.gov> wrote:
All,

I had a quick response from Tyler Fox of OAQPS today regarding the question of use of prognostic data when collection of site-specific data is feasible for a project:

Tyler confirmed Appendix W does not require the use of site-specific data over the other options of NWS and prognostic data. Therefore, the three options of site-specific, NWS/ASOS, and prognostic data use are on "equal footing" regarding their use for NSR permitting. This is emphasized in the requirement under Appendix W Section 8.4.1(c). Although site-specific data continues to be preferred, it is not required.

The wording in Section 8.4.5.1 that states "it may be cost prohibitive or infeasible to collect adequately representative site-specific data" is not intended to pose a requirement on reviewing authorities that they must demonstrate infeasibility of site-specific monitoring before allowing use of prognostic data.

Tyler invited us to engage folks in OAQPS to assist with recommendations regarding the WRF performance evaluation, to ensure the State is requiring a sufficient level of review. If the applicant or State cannot demonstrate the prognostic meteorological data are representative of transport and dispersion conditions in the vicinity of the source, then a site-specific dataset will be necessary.

Jay

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